

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

DANIEL D'AMBLY, AARON WOLKIND, STEVE  
HARTLEY, RICHARD SCHWETZ, JOBEL  
BARBOSA, MATTHEW REIDINGER, JOHN HUGO,  
SEAN-MICHAEL DAVID SCOTT, THOMAS  
LOUDEN, ZACHARY REHL, AMANDA REHL, K.R.,  
a minor, by and through her father ZACHARY REHL,  
and her mother AMANDA REHL, MARK ANTHONY  
TUCCI,

Plaintiffs,

vs.

CHRISTIAN EXOO a/k/a ANTIFASH GORDON, ST.  
LAWRENCE UNIVERSITY, TRIBUNE PUBLISHING  
COMPANY, NEW YORK DAILY NEWS, VIJAYA  
GADDE, TWITTER, INC., COHEN, WEISS AND  
SIMON, LLP, UNNAMED ASSOCIATES 1 - 100.

Defendants.

CIVIL ACTION  
NO.: 2:20-cv-12880-  
JMV-JAD

Hon. John M.  
Vazquez, U.S.D.J.

Oral Argument  
Requested

Return Date:  
February 7, 2022

**DEFENDANT CHRISTIAN EXOO'S MOTION TO DISMISS WITH  
PREJUDICE PURSUANT TO F.R.C.P. Rules 12(b)(2) and 12(b)(6)**

**PLEASE TAKE NOTICE** that on February 7, 2022 or on a date and time to be set by the Court, Defendants Christian Exoo ("Defendant"), by and through his attorneys, Richard Torres, Esq. and The Marlborough Law Firm, P.C. shall move before the United States District Court for the District of New Jersey, located at Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ

07102, for the entry of an Order pursuant to F.R.C.P. Sections 12(b)(1); 12(b)(2) and 12(b)(6) dismissing with prejudice Counts II, IV, V and VII of Plaintiff's Complaint and the Cross-claims filed by Co-Defendant Cohen, Weiss and Simon, LLP.

**PLEASE TAKE FURTHER NOTICE** that in support of the within Motion, Defendants shall rely upon the Memorandum and Declaration of Richard Torres submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is also submitted herewith.



Dated: January 14, 2022

By: /s/  
Richard Torres

**Richard Torres, Esq.**  
63 Tooker Avenue  
Springfield, New Jersey 07081  
E-mail: richardtorresdna@gmail.com

**THE MARLBOROUGH LAW FIRM, P.C.**  
Christopher Marlborough, Esq.  
445 Broad Hollow Road, Suite 400  
Melville, New York 11747  
Phone: (212) 991-8960  
Fax: (212) 991-8952  
E-mail: [chris@marlboroughlawfirm.com](mailto:chris@marlboroughlawfirm.com)

*Counsel for Defendant Christian Exoo*